

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

For Clerk's Office Use	
Judge <u>D</u>	Rec'd

DEC 19 2019

IN THE UNITED STATES DISTRICT  
COURT FOR THE WESTERN DISTRICT  
OF VIRGINIAJULIA C. DUDLEY, CLERK  
BY: [Signature]  
DEPUTY CLERK

For use by inmates filing a complaint under CIVIL RIGHTS ACT, 42 U.S.C. §1983

TRAVIS WAYNE TOLLEY

Plaintiff full name

10646256

Inmate No.

v.

CIVIL ACTION NO.

719CV0086312 DEFENDANTS "SEE ATTACHED"

Defendant(s) full name(s)

\*\*\*\*\*

A. Current facility and address: ALBEMARLE-CHARLOTTESVILLE REGIONAL JAIL160 Peregrory Lane, Charlottesville, VA 22902B. Where did this action take place? ROCKBRIDGE COUNTY, VA

C. Have you begun an action in state or federal court dealing with the same facts involved in this complaint?

       Yes  ✓   No

If your answer to A is Yes, answer the following:

1. Court: \_\_\_\_\_

2. Case Number: \_\_\_\_\_

D. Have you filed any grievances regarding the facts of this complaint?

  ✓   Yes       No

1. If your answer is Yes, indicate the result:

Made several document complaints to local and state officials

2. If your answer is No, indicate why: \_\_\_\_\_

- E. Statement of Claim(s): State briefly the facts in this complaint. Describe what action(s) each defendant took in violation of your federal rights and include the relevant dates and places. **Do not give any legal arguments or cite any cases or statutes.** If necessary, you may attach additional page(s). Please write legibly.

Claim #1 – Supporting Facts – Briefly tell your story without citing cases or law:

"SEE ATTACHED"

Claim #2 – Supporting Facts – Briefly tell your story without citing cases or law:

"SEE ATTACHED"

- F. State what relief you seek from the Court. Make no legal arguments and cite no cases or statutes.

\$ 3,325,000.00 in compensation and punitive damages

- G. If this case goes to trial do you request a trial by jury? Yes ☒ No ☐

- H. If I am released or transferred, I understand it is my responsibility to immediately notify the court in writing of any change of address after I have been released or transferred or my case may be dismissed.

DATED: DECEMBER 1, 2019 SIGNATURE: Travis W. Tolley

VERIFICATION:

I, TRAVIS WAYNE TOLLEY, state that I am the plaintiff in this action and I know the content of the above complaint; that it is true of my own knowledge, except as to those matters that are stated to be based on information and belief, and as to those matters, I believe them to be true. I further state that I believe the factual assertions are sufficient to support a claim of violation of constitutional rights. Further, I verify that I am aware of the provisions set forth in 28 U.S.C. §1915 that prohibit an inmate from filing a civil action or appeal, if the prisoner has, on three or more occasions, while incarcerated brought an action or appeal in federal court that is dismissed on the grounds that it was frivolous, malicious, or failed to state a claim upon which relief may be granted, unless the prisoner is imminent danger of serious physical injury. I understand that if this complaint is dismissed on any of the above grounds, I may be prohibited from filing any future actions without the pre-payment of the filing fees. I declare under penalty of perjury the foregoing to be true and correct.

DATED: DECEMBER 1, 2019 SIGNATURE: Travis W. Tolley

DEFENDANTS "ATTACHED FORM" TRAVIS WAYNE TOLLEY V. 12 DEFENDANTS

1. DEFENDANT,

ROCKBRIDGE REGIONAL DRUG TASK FORCE

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

258 Greenhouse Road, Lexington VA 24450

2. DEFENDANT,

BEN CALDWELL - ROCKBRIDGE REGIONAL DRUG TASK FORCE MEMBER

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

258 Greenhouse Road, Lexington VA 24450

3. DEFENDANT,

A.W. BUZZARD - ROCKBRIDGE REGIONAL DRUG TASK FORCE MEMBER

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

258 Greenhouse Road, Lexington VA 24450

4. DEFENDANT,

~~ROCK~~ GREG GARDNER - LEXINGTON POLICEMAN AND FORMER  
ROCKBRIDGE REGIONAL DRUG TASK FORCE MEMBER

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

11 Fuller Street, Lexington VA 24450

5. DEFENDANT,

PHILLIP FLINT - ROCKBRIDGE REGIONAL DRUG TASK FORCE MEMBER

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

258 Greenhouse Road, Lexington VA 24450

DEFENDANTS "ATTACHED FORM" CONT

6. DEFENDANT,

ANDY FISHER - STATE POLICE INVESTIGATOR

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

258 Greenhouse Road, Lexington VA 24450

7. DEFENDANT,

ROBYN WILHELM - ROCKBRIDGE COUNTY MAGISTRATE

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

258 Greenhouse Road, Lexington VA 24450

8. DEFENDANT,

SAM ROMAN - LEXINGTON POLICE CHIEF

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

11 Fuller Street, Lexington VA 24450

9. DEFENDANT,

TROY WYMER - ROCKBRIDGE SHERIFF OFFICE DEPUTY

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

258 Greenhouse Road, Lexington VA 24450

10. DEFENDANT

COUNTY OF ROCKBRIDGE, VIRGINIA

✓ INDIVIDUAL CAPACITY

✓ OFFICIAL CAPACITY

150 South Main Street, Lexington VA 24450

11. DEFENDANT

CITY OF LEXINGTON, VIRGINIA

✓ INDIVIDUAL CAPACITY      ✓ OFFICIAL CAPACITY

14 East Nelson Street, Lexington, VA 24450

12. DEFENDANT

CITY OF BUENA VISTA, VIRGINIA

✓ INDIVIDUAL CAPACITY      ✓ OFFICIAL CAPACITY

65 East Midland Trail, Lexington, VA 24450

42 USC 1983 COMPLAINT SECTION E : DESCRIPTION

1. JANUARY 8, 2018

DEFENDANT A.W. BUZZARD

is the sole affiant of a "BARE BONES" affidavit to obtain a search warrant on the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON VA 24450 PROPERTY

2. JANUARY 8, 2018

DEFENDANT ROBYN WILHELM

is the sole magistrate signing if effect a search warrant on a "BARE BONES" affidavit on the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 PROPERTY

3. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, BEN CALDWELL, A.W. BUZZARD, GREG GARDNER, PHILLIP FLINT, execute an "ALL PERSON PRESENT" search warrant on the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 PROPERTY. The search warrant only specified the search of : THE RESIDENCE, VEHICLES, AND OUT BUILDINGS ON CURTILAGE

4. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, BEN CALDWELL, A.W. BUZZARD, GREG GARDNER, PHILLIP FLINT, execute an "ALL PERSON PRESENT" search warrant on the plaintiffs rental tenants at : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 PROPERTY

5. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, AND BEN CALDWELL fails to secure the plaintiffs: 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 PROPERTY AND RESIDENCE after escorting the plaintiff to the ROCKBRIDGE REGIONAL JAIL allowing the plaintiffs residence to be damaged and robbed before the plaintiff posted bond.

6. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE AND BEN CALDWELL forced the plaintiff to ride in the K-9 transport van. A vehicle not normally used to transport individuals charged with a crime. Although there were several police cruisers and transport vehicles at the plaintiffs: 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 PROPERTY after pleading to DEFENDANT BEN CALDWELL by the plaintiff explaining the plaintiffs extreme fear of dogs. The plaintiff was forced to ride in the K-9 transport van with an out of control K-9 barking, growling and biting at the plaintiff through a thin clear glass. The defendant was forced to ride with the K-9 for intimidation purposes by the DEFENDANT BEN CALDWELL.

7. JANUARY 10, 2018

DEFENDANT BEN CALDWELL, A.W. BUZZARD, GREG GARDNER, AND PHILLIP FLINT, confiscate "SURVEILLANCE EQUIPMENT" of the plaintiffs, items outside the scope of the search warrant at: 491 BIG SPRING DRIVE, LEXINGTON, VA 24450

8. JANUARY 10, 2018

DEFENDANT GREG GARDNER

confiscates the plaintiffs 'JVC TAPE RECORDER' rolling live feed during the search of the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE, an item outside the "scope of the search warrant". Upon finding the plaintiffs 'JVC TAPE RECORDER' mounted to the plaintiffs interior wall, DEFENDANT GREG GARDNER : chuckles, states his name and occupation, time and date, into the live rolling 'JVC TAPE RECORDER' turns off the 'JVC TAPE RECORDER' and seizes the 'JVC TAPE RECORDER' into evidence against the plaintiff.

9. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, BEN CALDWELL, PHILLIP FLINT, A.W. BUZZARD, GREG GARDNER,

during the search of the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE the above mentioned DEFENDANTS pull the wires out the back of four security cameras located on the exterior of the plaintiffs residence.



10. JANUARY 2018

DEFENDANTS ANDY FISHER, A.W. BUZZARD, PHILLIP FLINT, AND GREG GARDNER, arrive at the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE approximately two days after the plaintiff posted bond from the plaintiffs arrest as a result from the JANUARY 10, 2018 search warrant.

DEFENDANTS ANDY FISHER, A.W. BUZZARD, PHILLIP FLINT, AND GREG GARDNER, return to the plaintiff, the plaintiffs illegally seized 'JVC TAPE RECORDER'. For approximately two weeks the above mentioned DEFENDANTS listen to all the files on the plaintiffs 'JVC TAPE RECORDER' files included but not limited to : PRIVATE CONVERSATIONS, MEMORABLE MOMENTS, AND RECORDED SEXUAL ENCOUNTERS WITH THE PLAINTIFFS THEN GIRLFRIEND - SHEENA WOODWARD MAYS. It should be noted DEFENDANT GREG GARDNER gets removed from the ROCKBRIDGE REGIONAL DRUG TASK FORCE for "SEXTING" with the plaintiffs girlfriend : SHEENA WOODWARD MAYS, the genesis of the "SEXUAL MISCONDUCT" started by illegally confiscating and listening to the plaintiffs 'JVC TAPE RECORDER' and listening to the plaintiffs 'SEXUAL ENCOUNTERS' with : SHEENA WOODWARD MAYS. It should also be noted the search warrant on the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE that was recorded on the plaintiffs 'JVC TAPE RECORDER' and the DEFENDANT GREG GARDNER'S acclamation of confiscation was switched to "LOCK MODE" by the hands of the DEFENDANTS so it could not be erased, proving the DEFENDANTS "thumbed" through the files on the plaintiffs 'JVC TAPE RECORDER' before returning it to the plaintiff.

## 11. JANUARY 2018

DEFENDANTS ANDY FISHER, A.W. BUZZARD, PHILLIP FLINT, AND GREG GARDNER, at the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE approximately two days after the plaintiff was released on bond from the plaintiffs JANUARY 10, 2018 arrest, the above mentioned defendants try to convince the plaintiff to violate the terms of the plaintiffs "SUPERVISED PROBATION AGREEMENT" which forbids the plaintiff to make "CONTROL BUYS" on supervised probation, but the DEFENDANTS try to convince the plaintiff to make a "CONTROL BUY" to work off the plaintiffs JANUARY 10, 2018 charge. DEFENDANT A.W. BUZZARD ~~goes~~ tells the plaintiff, "The new judge (ANITA FILSON) allows individuals on supervised probation to make 'CONTROL BUYS' on supervised probation". DEFENDANT A.W. BUZZARD goes on to say to the plaintiff, "[THE PLAINTIFF] can use drugs during control buys" stating, "there are ways around it."

## 12. JANUARY 2018

DEFENDANT ANDY FISHER, A.W. BUZZARD, PHILLIP FLINT, AND GREG GARDNER, at the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE approximately two days after the plaintiffs release on bond from the plaintiffs JANUARY 10, 2018 arrest, the above mentioned DEFENDANTS refuse to investigate or place a report on file at the ROCKBRIDGE SHERIFF'S OFFICE a break in and robbery that the plaintiff wanted to report on the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE, while the plaintiff was incarcerated on JANUARY 10, 2018. The DEFENDANTS tell the plaintiff, "choose a better group of friends".

13. MARCH 1, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, BEN CALDWELL, AND GREG GARDNER, while executing a search warrant on the plaintiffs: 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 PROPERTY find the plaintiff naked in the shower. DEFENDANT GREG GARDNER refuses to let the plaintiff dress himself. DEFENDANT GREG GARDNER kneels down eye level with the plaintiffs penis beside DEFENDANT BEN CALDWELL, while the plaintiff is completely naked in handcuffs standing in the plaintiffs living room, and DEFENDANT GREG GARDNER proceeds to put a pair of shorts on the plaintiff, not letting the plaintiff dress himself, while participating in "SEXUAL MISCONDUCT" with the plaintiffs girlfriend: SHEENA WOODWARD MAYS, unknown to the plaintiff at that time.

14. MARCH 1, 2018

DEFENDANT BEN CALDWELL AND A.W. BUZZARD, During a search warrant of the plaintiffs: 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 PROPERTY, DEFENDANT BEN CALDWELL AND A.W. BUZZARD, plant "ONE SYRINGE" on the curtilidge of the plaintiffs property, using the "PLANTED SYRINGE" as a bargaining tool to try to get the plaintiff to snitch. DEFENDANT BEN CALDWELL AND A.W. BUZZARD confiscate the "PLANTED SYRINGE" write it on the "search warrant inventory list" but does not charge the plaintiff.

15. MARCH 1, 2018

DEFENDANT A.W. BUZZARD AND BEN CALDWELL, while executing a search warrant on the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE, DEFENDANT BEN CALDWELL starts to complain about bible verses the plaintiff has copied on the plaintiffs doorways - Specifically : DEUTERONOMY 6 : 4-9 and bible verses PSALMS 143:2 and PSALMS 23, copied on the plaintiffs "BIG BROWN CANVAS" on the plaintiffs interior wall that was constructed to organize and store the plaintiffs evidence for the plaintiffs JANUARY 10, 2018 criminal charge. DEFENDANT BEN CALDWELL, hollers at the plaintiff who is detained in handcuffs, "You aint no preacher boy", then demands the plaintiff to recite PSALMS 23. When the plaintiff complies DEFENDANT BEN CALDWELL hollers "[THE PLAINTIFF] You make me sick" then walks off. DEFENDANT A.W. BUZZARD states calmly to the plaintiff, "[THE PLAINTIFF] Your not a christian because you are a drug addict", then states "[THE DEFENDANT] I'm worthy to stand in front of my GOD," then states "[THE PLAINTIFF] Your not worthy to stand in front of my GOD." Upon finishing the search of the plaintiffs residence, DEFENDANT A.W. BUZZARD releases the plaintiff from custody and the plaintiff finds his "BIBLE DVD" with a picture of JESUS on the front cover crucified in black duct tape to the plaintiffs interior wall. A horrific and intimidating act by law-enforcement officials.

16. MARCH 1, 2018

DEFENDANT A.W. BUZZARD AND BEN CALDWELL, while executing a search warrant on the plaintiffs: 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE, DEFENDANT A.W. BUZZARD AND BEN CALDWELL, take the plaintiffs IPHONE while the plaintiff is detained in hand cuffs the DEFENDANTS demand the plaintiff to explain to the DEFENDANTS why SHEENA WOODWARD MAYS is calling the plaintiff, the DEFENDANT A.W. BUZZARD AND BEN CALDWELL repeatedly try to break into the plaintiffs IPHONE in front of the plaintiff. The search warrant did not authorize search or seizure of plaintiffs IPHONE.

17. MARCH 1, 2018

DEFENDANT A.W. BUZZARD, while executing a search warrant on the plaintiffs: 491 BIG SPRING DRIVE, LEXINGTON VA 24450 RESIDENCE, DEFENDANT A.W. BUZZARD takes a picture of a "BIG BROWN CANVAS" mounted on the plaintiffs interior wall, the "BIG BROWN CANVAS" is the plaintiffs evidence for the plaintiffs JANUARY 10, 2018 criminal charge. In a mad rage DEFENDANT A.W. BUZZARD proceeds to rip the "BIG BROWN CANVAS" off the wall into several pieces in front of the plaintiff who is still in handcuffs. The plaintiff notifies his attorney who then contacts and makes a complaint with former ROCKBRIDGE COMMONWEALTH ATTORNEY CHRIS BILLIAS

18. MARCH 1, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE,  
upon leaving the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA  
24450 PROPERTY, the DEFENDANT does not arrest the plaintiff.  
The plaintiff finds a .223 caliber bullet on the outside deck floor  
of the plaintiffs side entry porch/deck. The .223 caliber bullet  
was facing towards the entry way of the plaintiffs side door.



19. JUNE 2018

DEFENDANT BEN CALDWELL AND TROY WYMER, enter the plaintiffs : 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 RESIDENCE without a search warrant, premission, or ~~authorization~~ authorization. Apparently one of the plaintiffs rental tenant had an open warrant for a probation violation. The subject was apprehended outside of the plaintiffs residence. There was no reason for either DEFENDANTS to enter the plaintiffs residence. While entering the residence DEFENDANT BEN CALDWELL makes the comment, "[THE PLAINTIFF] is high somewhere in the house hiding with his little dick in his hand," presumably a comment refrencing the MARCH 1, 2018 incident when DEFENDANT BEN CALDWELL refused to let the plaintiff dress himself. DEFENDANT BEN CALDWELL made this comment to two of the plaintiffs rental tenants present on the plaintiffs property at that time. The plaintiff was hiding on the curtilidge of the plaintiffs property and visually witnessed DEFENDANT BEN CALDWELL AND TROY WYMER enter the plaintiffs residence. While inside the plaintiffs residence DEFENDANT BEN CALDWELL forced one of the plaintiffs rental tenants to walk room to room with the DEFENDANT hollering the plaintiffs name for the DEFENDANT. It should be noted out of ~~several~~ numerous law-enforcement officers on the plaintiffs property, DEFENDANTS BEN CALDWELL AND TROY WYMER were the only two who entered the residence, and the plaintiff did not have any open warrants at that time.

20. JULY 5, 2018

DEFENDANT GREG GARDNER,

for participating as lead investigator in "DIRTY BUST" against the plaintiff involving a confidential informant - CI, MICHAEL TAYLOR, SHEENA WOODWARD MAYS, ~~and the plaintiff~~ and allegedly the plaintiff. Using a CI that is known for lying to law-enforcement. Allowing the CI ~~to use~~ to use alleged drugs on police issued surveillance. Allowing the CI to use alleged drugs on "PRE-TRIAL PROBATION" with the ROCKBRIDGE CIRCUIT COURT bond requirement for the CI. Allowing the CI to use alleged drugs sitting in the drivers seat and allowing the CI to drive away after smoking alleged drugs. Allowing the CI to break several Virginia laws to hopefully / possibly enforce one on the plaintiff.

21. JULY 5, 2018 - NOVEMBER 2018

DEFENDANT GREG GARDNER

manipulated the ROCKBRIDGE JUSTICE SYSTEM against the plaintiff, by allowing the plaintiffs girlfriend: SHEENA WOODWARD MAYS to stay out of jail so the "SEXUAL MISCONDUCT" between DEFENDANT GREG GARDNER and the plaintiffs girlfriend: SHEENA WOODWARD MAYS can continue. DEFENDANT GREG GARDNER participated in "SEXTING" the plaintiffs girlfriend: SHEENA WOODWARD MAYS while investigating and criminally charging the plaintiff.



22. JULY 5, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE

for not have a protocol of rules that prohibits ROCKBRIDGE REGIONAL DRUG TASK FORCE MEMBERS to participate in "SEXUAL MISCONDUCT" with individuals they are investigating for suspected crimes and/or the girlfriend or spouse of individuals the DEFENDANT is investigating for suspected crimes in this case the plaintiffs girlfriend: SHEENA WOODWARD MAYS

23. JULY 19, 2018

DEFENDANT A.W. BUZZARD

sits positioned at the bottom of the plaintiffs: 491 BIG SPRING DRIVE, LEXINGTON, VA 24450 PROPERTY pulling over and harrasing the plaintiffs tenants, when the plaintiffs tenants pull out the plaintiffs driveway. Plaintiff reports incident to ROCKBRIDGE SHERIFFS OFFICE.

24. SEPTEMBER 6, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE

enter the plaintiffs: 491 BIG SPRING DRIVE, LEXINGTON VA 24450 RESIDENCE to apprehend the plaintiff. DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE search the plaintiffs residence for over a hour in front of three witnesses before GREG GARDNER leaves the plaintiffs property to obtain a search warrant for the plaintiffs residence, then returns.

25. JULY 2018 - NOVEMBER 2018 to PRESENT

DEFENDANT SAM ROMAN - LEXINGTON POLICE CHIEF

has failed in his duty by "OVERLOOKING" GREG GARDNERS actions of "SEXUAL MISCONDUCT" with the plaintiffs girlfriend: SHEENA WOODWARD MAYS, ~~and~~ while GREG GARDNER investigated and charged the plaintiff with criminal charges, DEFENDANT SAM ROMAN allows GREG GARDNER to stay on the LEXINGTON POLICE DEPARTMENT with a history of questionable unethical acts and motives.

26. JANUARY 2018 - NOVEMBER 2018 to PRESENT

DEFENDANT COUNTY OF ROCKBRIDGE, CITY OF LEXINGTON, CITY OF

BUENA VISTA, ALL THREE LISTED ARE IN THE STATE OF VIRGINIA

for allowing the ROCKBRIDGE REGIONAL DRUG TASK FORCE to disregard the plaintiffs constitutional rights and not having a system to "over see" or "monitor" actions of rogue law-enforcement officers that have trampled the constitutional rights of the plaintiff

42 USC 1983 COMPLAINT SECTION E: VIOLATION

1. JANUARY 8, 2018

DEFENDANT A.W. BUZZARD

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION

AGAINST THE PLAINTIFF

\$ 200,000.00

2. JANUARY 8, 2018

DEFENDANT ROBYN WILHELM

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION

AGAINST THE PLAINTIFF

\$ 100,000.00

3. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, BEN CALDWELL,

A.W. BUZZARD, GREG GARDNER, PHILLIP FUNT

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION

AGAINST THE PLAINTIFF

\$ 200,000.00

4. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, BEN CALDWELL,

A.W. BUZZARD, GREG GARDNER, PHILLIP FLINT,

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION

AGAINST THE PLAINTIFF

\$ 200,000.00

5. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE AND BEN CALDWELL  
UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF  
\$ 25,000.00

6. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE AND BEN CALDWELL  
UNITED STATES CONSTITUTION 8TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF  
\$ 75,000.00

7. JANUARY 10, 2018

DEFENDANT BEN CALDWELL, A.W. BUZZARD, GREG GARDNER, AND PHILLIP FLINT,  
UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF  
\$ 100,000.00

8. JANUARY 10, 2018

DEFENDANT GREG GARDNER  
UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF  
\$ 200,000.00

9. JANUARY 10, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, BEN CALDWELL,  
PHILLIP FLINT, A.W. BUZZARD, GREG GARDNER

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 25,000.00

10. JANUARY 2018

DEFENDANT ANDY FISHER, A.W. BUZZARD, PHILLIP FLINT, AND GREG GARDNER

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 200,000.00

11. JANUARY 2018

DEFENDANT ANDY FISHER, A.W. BUZZARD, PHILLIP FLINT, AND GREG GARDNER

UNITED STATES CONSTITUTION 5TH AND 14TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 25,000.00

12. JANUARY 2018

DEFENDANT ANDY FISHER, A.W. BUZZARD, PHILLIP FLINT, AND GREG GARDNER

UNITED STATES CONSTITUTION 14TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 25,000.00

13. MARCH 1, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE, BEN CALDWELL,  
AND GREG GARDNER

UNITED STATES CONSTITUTION 4TH AND 8TH ~~AMEND~~ AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 200,000.00

14. MARCH 1, 2018

DEFENDANT BEN CALDWELL AND A.W. BUZZARD

UNITED STATES CONSTITUTION 4TH AND 5TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 200,000.00

15. MARCH 1, 2018

DEFENDANT A.W. BUZZARD AND BEN CALDWELL

UNITED STATES CONSTITUTION 1ST AND 8TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 75,000.00

16. MARCH 1, 2018

DEFENDANT A.W. BUZZARD AND BEN CALDWELL

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 100,000.00

17. MARCH 1, 2018

DEFENDANT A.W. BUZZARD

UNITED STATES CONSTITUTION 4TH AND 5TH AND 14TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 200,000.00

18. MARCH 1, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE

UNITED STATES CONSTITUTION 8TH AND 14TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 75,000

19. JUNE 2018

DEFENDANT BEN CALDWELL AND TROY WYMER

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 200,000.00

20. JULY 5, 2018

DEFENDANT GREG GARDNER

UNITED STATES CONSTITUTION 5TH AND 14TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 75,000.00

21. JULY 5, 2018 - NOVEMBER 2018

DEFENDANT GREG GARDNER

UNITED STATES CONSTITUTION 5TH AND 14TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 75,000.00

22. JULY 5, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE

UNITED STATES CONSTITUTION 5TH AND 14TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 75,000.00

23. JULY 19, 2018

DEFENDANT A.W. BUZZARD

UNITED STATES CONSTITUTION 4TH AND 14TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 200,000.00

24. SEPTEMBER 6, 2018

DEFENDANT ROCKBRIDGE REGIONAL DRUG TASK FORCE

UNITED STATES CONSTITUTION 4TH AMENDMENT VIOLATION  
AGAINST THE PLAINTIFF

\$ 200,000.00



25. JULY 2018 - NOVEMBER 2018 to PRESENT

DEFENDANT SAM ROMAN - LEXINGTON POLICE CHIEF

UNITED STATES CONSTITUTION 5TH AND 14TH AMENDMENT VIOLATION

AGAINST THE PLAINTIFF

\$ 75,000.00

26. JANUARY 2018 - NOVEMBER 2018 to PRESENT

DEFENDANT COUNTY OF ROCKBRIDGE, VA, CITY OF LEXINGTON, VA,

CITY OF BUENA VISTA, VA

UNITED STATES CONSTITUTION 1ST, 4TH, 5TH, 8TH, 14TH AMENDMENT VIOLATION

AGAINST THE PLAINTIFF

\$ 200,000.00

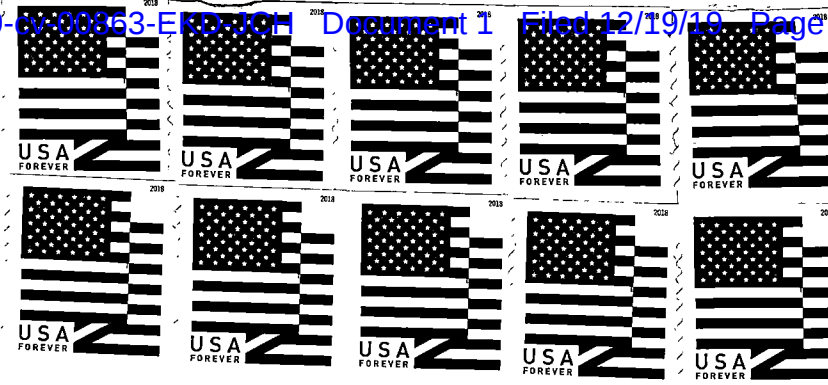
TRAVIS WAYNE TOLLEY 10646256  
ALBEMARLE-CHARLOTTESVILLE REGION  
160 PEREGORY LANE  
CHARLOTTESVILLE, VA 22902

CLE

210

RO

JAIL



ARK, UNITED STATES DISTRICT COURT  
D FRANKLIN ROAD, SW, SUITE 540  
ANOKE, VA 24011-2208